III.   REMARKS

Claims 1-26 remain pending. Claims 1-6, 9-11, 13-16, 18-23 and 26 are rejected under 35 U.S.C. 103(a) as being allegedly unpatentable by Angel et al., US 2002/0133392 A1 (Angel). Claims 7-8, 12, 17, and 24-25 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Angel in view of Pope et al., US 2003/0055737 A1 (Pope). Applicants have herein amended claims 1, 10 and 18. No new matter is believed added.

Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

With regard to independent claim 1 (and similarly claims 10 and 18), Applicants submit that Angel fails to teach each and every feature presented in the claim. Initially, Applicants point out that Angel teaches a content steering engine (see, e.g., Figure 1) that is used to steer an end user to content in a distributed network to address an existing issue (i.e., it provides on-line customer support). Angel does not teach a case management system for managing customer cases. Angel merely provides a system for submitting queries and retrieving content from one or more disparate providers (see, e.g., claim 1).

Conversely, Applicants provide a system that can manage cases, and includes, *inter alia*, a compliance tracking system that retrieves previously loaded customer compliance data from a database; wherein the compliance data consists of information related to whether a customer has met certain pre-set goals.

In the Advisory Action, the Office cites to paragraph [0044] of Angel for disclosure of previously loaded customer compliance data from a database. Applicants appear to have a

different understanding of the term "compliance data" than the Office. In this Amendment, Applicants have attempted to amend claims 1, 10 and 18 to better reflect that the claimed invention is directed to compiling different information than the Angel system. In Angel, the information that is retrieved from a database about a customer is not related to compliance. In contrast, the compliance parameters that are tracked in the claimed invention relate to whether a customer has met certain required pre-set goals. For example, whether a student has attended required classes or failed an exam, has too many absences, etc. (in an academic environment) or whether a patient has filled necessary prescriptions, attended therapy sessions, etc. (in a medical environment).

In contrast, as the Office notes, the Angel system simply determines "whether a customer should be receiving support from the current support provider or another support provider." 2/7/07 Office Action at 3. Angel's system does not pull from previously uploaded information about a customer's compliance (i.e., whether a customer has met certain required pre-set goals) as in the claimed invention.

Moreover, as recited in claim 10 (and similarly claims 1 and 18), the present invention provides "displaying a compliance indicator when the customer case management page is viewed." The Advisory Action alleges that this feature is taught in paragraph 0087 of Angel, as "an exit node indicator on the customer session page." Applicants respectfully traverse this interpretation of Angel. Again, Applicants believe that the conflicting positions taken by the Office and Applicants relate to the meaning assigned to the word "compliance." The Office has apparently taken the position that compliance could be read to mean anything about a customer's actions, e.g., what hardware or operating system the user is using. Applicants disagree, and have amended claims 1, 10 and 18 in an attempt to convey their understanding of what "compliance

data" refers to in the claimed invention, i.e., whether a customer has met certain required pre-set goals.

Nowhere does Angel teach or suggest displaying a compliance indicator. As the Office states, "the exit node of Angel is triggered through a dialog between the user and a content provider, and is based on the fact that the customer is operating a particular hardware or operating system." Advisory Action, p.2. However, that fact does not constitute compliance data as claimed in the claimed invention. The fact that a customer uses a particular hardware or operating system does not relate to whether a customer has met certain required pre-set goals.

Further, the system of Angel does not teach displaying a compliance indicator on the customer case management page. Even if, arguendo, one did interpret an exit node as a compliance indicator, nowhere does Angel teach displaying the exit node in a customer case management page. Instead, Angel explicitly discloses a dialog that *seamlessly* transfers a user from one web site to another while the user looks to obtain help (see, e.g., para. 0081). In other words, a user of Angel's system is not even aware that a particular item in a dialog is going to send them to a different web site until after they click on the link. Thus, such an item cannot possibly, under any reasonable interpretation, be interpreted to indicate compliance. The Office states that it would have been obvious to one of ordinary skill in the art "to view all cases opened for a given customer with the motivation of allowing retrieval of case information for an entity connected to the immediate network." 7/26/07 Office Action, p. 4. Notwithstanding whether this is true or not, Applicants respectfully submit that this is not the same as displaying a compliance indicator on a customer case management page. The Office seems to imply that viewing all cases for a particular customer is equivalent to a compliance indicator. Applicants respectfully disagree. As discussed above, the compliance indicator of the claimed invention

10/630,392   10

displays information processed by the compliance tracking system. It is not simply a recitation of all open cases for any given customer.

Accordingly, Applicants submit that for these reasons, claims 1, 10, 18 are not unpatentable over Angel.

Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features. The secondary reference, Pope, fails to remedy the aforementioned deficiencies found in Angel.

Applicants respectfully submit that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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